88-1002

Supreme Court, U.S.
FILED
DEC 15 1988
JOSEPH F. SPANIOL, JR.
CLERK

NO:

in the

Supreme Court

of the

United States

October Term, 1988

EDITH HOROWITZ BROIDA,

Petitioner

vs.

EDMUND NEWBOLD

Respondent.

PETITION FOR WRIT OF CERTIORARI
TO THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

EDITH BROIDA, ESQ.
420 Lincoln Road
Suite 256
P. O. Box 390751
Miami Beach, Florida
33119
(305) 532-3431

Pro Se for Petitioner

QUESTIONS PRESENTED

I. Whether the District Court entering a summary judgment on behalf of a state circuit court judge, who is a defendant in a civil suit for constitutional civil rights deprivation under Sec. 1983, Title 42 USC, can grant to the defendant a non-existent judicial immunity drawn from inapplicable case law applying to prosecutors, and the appeal court affirm, in direct conflict with established Supreme Court, other Circuit Appeal Courts, and the same Eleventh Circuit Appeal court holdings that a judge who has no jurisdiction over a cause whatsoever has no kind of judicial immunity of any nature from civil suit, and no discretionary authority as granted by the district court to interfere with that cause presided over by another judge, and from which this Defendant was disqualified for prejudice

against plaintiff/ petitioner herein who was a litigant in that cause before Defendant in the state court from 1983 until disqualification in May, 1984, which prejudice he admitted (App 9),or that as a judge he has discretionary authority to exercise control over the state court action choosing a succeeding judge,directing him and attorneys who had been before him in that cause, or attorneys he had appointed into the cause, and in which state action he had caused plaintiff/petitioner herein unconscionable injury which he has continued through his control after disqualification. (App 7, Order Granting Defendant Summary Judgment). Dennis v. Sparks, 449 U.S. 24, 101 SCt 183, ;980, Harper v. Merkle, 5th Cir., 638 F2d 748, 1981, cert. denied Merkle v. Harper, 454 U.S. 816, 70 LEd2d 85, October, 1981

2. Whether state and federal statutes providing a judge can be disqualified for prejudice intend that when such judge enters order of disqualification and after such removal from the cause he can nevertheless continue to exercise control over it to carry out his prejudiced intentions through obtaining a year after his disqualification assignment of a personal friend as judge with an agreement as to how that judge will pro - ceed, and by instructions to private and his previously appointed attorneys in the cause. Fla. Stat. 38.10 Disqualification of Judge for Prejudice.

3. Whether a state court judge and his attorney, a public official

are held to a high standard of not presenting false and inapplicable law in their defensive pleadings in defiance of Rule 11, and bad faith affidavit of a mere denial of some allegations and admission of others, said admission proving in fact one act taken without jurisdiction, in defiance of Rule 56 (g).

4. Whether the district court can enter summary judgment, and appeal court confirm it, by disregarding the fact that defendant's pleading in answer and affidavit raise genuine issues of material fact, and distort the allegations of the complaint and apply totally inapplicable law dealing with immunity for public prosecutors thereby concocting their own creation of a new judicial immunity;

and deprive plaintiff of the hearing provided by Fed. Rule 56 (c) and (d). on summary judgment.

5. Whether the district judge and the appeal court judges may be relieved of all responsibility for accepting inapplicable law, distortions of facts, failure to observe established law, and federal rules of civil procedure.

Note: The word Appendix will be abbreviated to App.

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OPINIONS BELOW

The decision of the United States Court of Appeals for the Eleventh Circuit affirming the Order of the district court which granted summary judgment to defendant on issue of judicial immunity, is dated July 22, 1988; rehearing denied September 16, 1988, reported at 854 F2d 1324, October 10, 1988. Rehearing denial at App 1, affirmance at App 2.

The Order of the United States District Court denying plaintiff's Motion for reconsideration is dated December 2, 1987 at App 3.

The Order of the United States District Court denying plaintiff's motion to set hearing on motion for reconsideration of summary judgment is dated September 18, 1987 at App5

The Order of the United States District Court for the Southern District of Florida granting

Defendant's Motion for Summary Judgment is dated September 2, 1987, is not published and is set forth at App 7.

JURISDICTION

The Eleventh Circuit Court of Appeals affirmance was entered July 22, 1988. Timely petition for rehearing was denied September 16, 1988.

Petition for Writ of Certiorari to the Eleventh Circuit Court of Appeals in the Supreme Court is filed within (90) days of that date.

This court's jurisdiction is invoked under 28 USC Sec. 1254 (1) and Sec. 2101 (c).

CONSTITUTIONAL PROVISIONS
STATUTES AND RULES INVOLVED

A. This case was brought on grounds of constitutional deprivation of Fifth Amendment rights of the United States Constitution, which provides:

> No person shall be deprived of life, liberty or property without due process of law. AND of

1. The Thirteenth Amendment:

> Neither slavery or involuntary servitude, except as punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction. AND OF

2. The Fourteenth Amendment

> Nor shall any state deprive any any person of life, liberty, or property without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws.

B. This case was brought by virtue of federal statutes under Title

Sec. 1983:

Every person who, under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia, subjects or causes to be subjected, any citizen of the United States or other person within the jurisdiction thereof to the deprivation of any rights, privileges, or immunities secured by the Constiution and laws, shall be liable to the party injured in an action at law, suit in equity, or other proper proceeding for redress.

C. Constitutional and statutory jurisdiction of the federal case has not been put in issue.

STATEMENT OF THE CASE

This is an action based on civil rights deprivation based primarily on federal statute Title 42, USC, Sec. 1983.

The complaint alleges that the defendant, a state court circuit judge, whose actions were taken under color of law as an acting judge of the Eleventh Circuit of Dade County, Florida had for one year presided over a probate cause for which he then had jurisdiction.

At the end of the year he was by formal statutory proceeding disqualified for prejudice adverse to plaintiff and he accepted such disqualification entering his order thereto.

That no longer having jurisdiction he nevertheless set hearing brought by an appointed attorney he placed into that cause to earn fees for that attorney and deliberately injure plaintiff, the hearing on said attorney's motion to vacate his order of disqualification. This act without jurisdiction indicates the intense interest in controlling the cause and retaining it before him. See excerpt of hearing Appendix p9 at which the co-heir and client of petitioner confronts the judge with his admission "I don't like you as a person, I don't like you as an attorney." made to plaintiff.

The allegations further

charge that the admission was deleted from the transcript by a court reporter later found to be a friend of defendant judge.

That defendant's acts when presiding over the cause were in abrogation of law, motivated by personal interest, causing unconscionble injury and financial loss to plaintiff. That defendant judge, after disqualification, continued his interest from then, May of 1984 (until the present) and a year later, instructed the assignment to the cause of a judge from another division, a close personal friend, under an agreement to carry out defendant's personal interest and intentions, being to strip plaintiff of all rights,

and through instructing his two appointed attorneys into the cause (both invalid appointments) and the private attorneys. That his actions when presiding were in abrogation of state statutes and established law.

That his actions after disqualification were to have the judge chosen by him continue abrogating statutes. That as a result of his directions plaintiff was held in contempt of court for refusing to breach a valid and binding contract although no due process hearing was held to hold the contract fraudulent and by Florida law said contract is irrevocable, being a disclaimer and agree-

ment by interested heirs on the disposition of an estate according to legally valid prior wills to the one they disclaim. Two Fla. Stats. hold this agreement binding: 733.815 (Appendix p 732.801 (4) (b).

Due to defendant's continued control the succeeding judge has stricken plaintiff's pleadings in that cause to recognize the agreement he is mandated by law to recognize, and to revoke a will declared invalid by all the heirs to it, and which cannot be accepted since it is invalid whether or not plaintiff objects. In addition the various attorneys have been instructed to seek surcharge

against plaintiff for her legal and valid appeals, suits filed to protect her rights.

Due to defendant's interference the present succeeding judge had caused independent actions filed by plaintiff in general jurisdiction, over which he has no jurisdiction, transferred to him, and has held them for three years. One action filed in equity to establish the valid will, and would have enjoined the probate proceeding and is a suit on spousal contract to make a will; another is a breach of contract suit on those breaching the settlement agreements, so incited by defendant judge.

Restraining the progress of those suits deprives plaintiff of equal protection of the laws, the right to access to the courts to protect her property rights.

In addition the decedent's estate was insolvent at death having only $3400., not enough for funeral costs. Plaintiff, an attorney, on the basis of an agreement between all family members, written and performed thereafter for five years, which held the lifetime agreement between decedents culminating in mutual and reciprocal wills naming their only two issue, plaintiff and her brother, as equal heirs and personal representatives, was the valid will., continued as attorney in an eminent domain case against the spouses residence having represented them for five years prior to death. By that agreement she would also contest an invalid will in which a preparing attorney a month before dece-

dent's death divided the estate of the 83 year old husband, senile and physically ill, who had survived his wife for six months, into an entirely different disposition than their mutual and reciprocal wills, which that preparing attorney acting as attorney for the husband as personal representative of his wife's estate, had filed for probate.

The new will he prepared, now dividing the estate into 13 equal shares, gave three such shares to the attorney, his wife, daughter. Such a will is considered to have been the result of undue influence. Plaintiff agreed to invest her time, money, manage the estate, the administration, make repairs, until the litigation was resolved.

Prior to assignment of defendant judge, newly assigned to probate division, plaintiff had invested $40,000. of her own money on the agreement with her brother, contesting the will, continuing the eminent domain cause. The preparing attorney was removed three and a half years before this assignment. The totally settled probate awaited only termination of the property cause for distribution according to the agreements until defendant abrogated statutes, and law, each action not error, but deliberately personally motivated. Plaintiff through her work alone placed a corpus of $400,000. into the estate after eleven years, two trials, two appeals, and her settlement.

The actions of Defendant judge and his purpose in continuing to direct the probate cause after he was disqualified from it is to protect fees for his appointed attorneys, and to carry out his plan to injure plaintiff and deprive her of all her interest in the estate,(no longer really an estate after the agreement of the family which made her an attorney to her brother having a power with an interest, and a business venture for them.)

The present judge has every intention of not returning any of her investment of money to her.

REASONS FOR GRANTING THE WRIT

The Eleventh Circuit Court of Appeals has systematically refused to hold judges or attorneys liable for wrongdoing. Other circuits have. The Supreme Court has.

The reluctance of the Court below is so continuous that one of its own members, Judge Hatchett, in a dissenting opinion in a case before it, Dykes v. Hosemann, 743 F2d 1488, 1984, berated his colleagues for not holding a judge of the courts over which they review at fault. While holding in that case that a judge without jurisdiction can be liable, they found the judge in question to have had the contested juris-

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Note: Since Defendant is not any longer the presiding judge there is no other recourse against him for the injuries he is causing acting without jurisdiction than this suit.

diction.

The appeal court's per curiam affirmance without opinion where the lower court unquestionably was in error is an indication of prejudice in the premises. (App 2)

To allow such a decision to stand becomes in fact an attack on the integrity of the court system, behooving the public to decry its courts as havens of prejudicial rulings and failing to protect constitutional rights. It is a benefit to the system when a judge engaged in wrongdoing is held by other judges to be responsible. Respect for all judges increases one hundredfold. Otherwise no one can seek protection in court.

THE RULINGS BELOW

The court of appeals entered no opinion but merely affirmed the district court, and denied without opinion petitioner's motion for rehearing. (App 1,2)

The district court entered summary judgment for defendant judge in an opinion holding defendant entitled to qualified judicial immunity as he has shown he acted within his discretionary authority. (App 7)

In supporting this ruling the district court accepted the answer of defendant claiming either absolute or qualified immunity of a judge using no cases related to judicial immunity but citing instead cases giving qualified immunity to prosecutors performing their jobs, albeit too zealously.

The Court cited Ziegler v. Jackson, 716 F.2d 847,(11 Cir. 1983); Marrero v. City of Hialeah, et al, 581 F.Supp 1207(SDFl)

Either the district judge did not read the complaint and just accepted the position of defendant's counsel, who is a paid county attorney assigned on a continuous basis to defend judges; or the district judge preferred to concoct his own view of the method of relieving the state circuit judge from the lawsuit. The district judge was a practicing attorney of that circuit a year before this case was filed .

The misrepresentation of the county attorney,counsel to defendant of the applicable law falls well within Rule 11 Sanctions. (See Affidavit,App10)

Can a judge who has been pre-

viously disqualified from a cause of action for serious prejudice and serious and unconscionable injury to that litigant when he had presided over the cause and had admitted such prejudice at the disqualification hearing (Appendix p 9) retain any discretionary authority to continue to direct the case from his position as a removed from the case judge as the allegations of the complaint state?

The district court and the appeal court ignored totally the established holdings of this Supreme Court and other district courts which were cited by petitioner.

The 5th Circuit Court of Appeals which preceded the creation of the 11th Circuit and which opinions the 11th was mandated to follow for several years

thereafter, albeit the 11th circuit has at least in this case before it refused to heed, held in Harper v. Merkle, 638 F2d 848, 1981 that a judge who assigned himself to a case taking control of it and causing serious injury to the litigant who sued him for damages for civil rights deprivation had no judicial immunity having no valid jurisdiction and was liable to civil suit for damages.

The district court and the appeal court have ignored the holdings of still other circuits. In Beard v. Udall, 648 Fed Rep 2d 1264, 1981 that court found summary judgment could not issue in a damage suit against a judge where there was a genuine issue of material fact as to whether the judge had conspired with others[fn1] and an issue as to whether he did or not have judicial immunity. 9th Cir.

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1. App 13, Defendant Newbold's Motion for Summary Judgment

Again in Carter v. Rupracht, 532 F. Supp 383, 1981 that court held allegations in the complaint that a private meeting took place with the judge presiding over the cause and certain statements made had to be accepted for the purpose of denying a summary judgment as raising issues of fact to be determined as to whether there was such a meeting and whether it removed judicial immunity. (D. Nevada).

The Supreme Court established rulings have also been ignored by the district and appeal courts in this cause. Stump v. Sparkman, 435 U. S. 439, 98 S. Ct. 1099, 55 LEd2d 331, 1978 clearly holds that a judge does not enjoy judicial immunity if the judge's actions were either non-judicial or taken in clear absence of all jurisdiction.

In the instant case the actions

of Defendant judge exercising control over a cause from which disqualified was without any jurisdiction. Dennis v. Sparks, 449 U.S. 24, 101 S. Ct 183, 1980 clearly holds a judge without jurisdiction can be sued for damages for wrongs he committed to civil litigant, and be called as a witness in a civil rights actions even if he had jurisdiction. This Court upheld the 5th Circuit on the same ruling, denying Defendant Judge's petition for certiorari, 454 U.S. 816, 70 LEd2d 85, Merkle v. Harper, 1981.

The established law, ignored by both lower courts is unequivocally clear. And a judge removed from a case for prejudice against or for a party is prohibited from presiding

and from any further contact with it.

THE DISTRICT COURT ENTERED
SUMMARY JUDGMENT FOR DEFENDANT

Summary judgment cannot be entered where material facts are in issue. The complaint is verified by plaintiff as a litigant and an attorney. Defendant by answer and affidavit admits that he acted without jurisdiction after disqualifying himself by holding hearing, brought by his appointed guardian-ad-litem (one of his often appointees) to vacate the order (and retain in the cause the judge who appointed him), and reluctantly denied the motion. (Excerpt App 9). Answer and affidavit deny all else claiming immunity or discretionary authority. Denial, even for a judge, raises issues of proof, but do not exonerate and avoid suit. Fed Rule 56 (c) provides for hearing on summary judgment, which can issue only if there is no genuine issue

of fact. Summary judgment was entered holding a judge has discretionary authority, although disqualified for prejudice, to be involved in the cause.

Floyd v. Trice, 490 F2d 1154, 1974 holds Sec. 1983 was intended a remedy for an official's abuse of constitutional rights.

CONCLUSION

Both lower courts abrogate established law and rules conflicting with this Court and other circuits.

Writ of Certiorari should be granted.

Respectfully submitted,

Edith Broida, Esq. Pro Se
420 Lincoln Road, Ste 256
Miami Beach, Fla. 33119
305-532-3431

CERTIFICATE OF SERVICE

It is hereby certified that three true and correct copies of the foregoing Petition for Writ of Certiorari were furnished by United States Mail this _____ day of 1988 to Roy Wood, Asst. County Attorney, 111 N. W. First St. Miami, Fla. 33128

_____
Edith Broida, Esq.

A P P E N D I X

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

No. 87-5898

Edith Horowitz Broida,
Plaintiff-Appellant,

versus

Edmund W. Newbold,
Defendant-Appellee

Appeal from the United States District Court for the Southern District of Florida

ON PETITION FOR REHEARING
(September 16, 1988)

BEFORE: HILL, FAY AND VANCE, Circuit Judges.

PER CURIAM:

The petition for rehearing filed by appellant, Edith Horowitz Broida is Denied.

ENTERED FOR THE COURT:

ROBERT S. VANCE
United States Circuit Judge

IN THE UNITED STATES COURT OF APPEALS
FOR THE ELEVENTH CIRCUIT

No. 87-5898
Non-Argument Calendar

D.C. Docket No. 87-1309

Edith Horowitz Broida,

Plaintiff-Appellant,

versus

Edmund W. Newbold,

Defendant-Appellee.

Appeal from the United States District Court for the Southern District of Florida

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(July 22, 1988)

Before Hill, Fay and Vance, Circuit Judges

Per Curiam:

AFFIRMED: See Circuit Rule 36-1

"Costs taxed against plaintiff-appellant.

Judgment entered: July 22, 1988
For the Court: Miguel J. Corez, Clerk
By: Karlen McNabb
Deputy Clerk
Issued as Mandate: Oct 11, 1988
(Initials in left corner)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 87-1309-Civ-Ryskamp

Edith Horowitz Broida,
Plaintiff,

vs.

Edmund W. Newbold,
Defendant

ORDER

This cause is before the court upon plaintiff's motion for reconsideration of summary judgment and to vacate it and motion for summary judgment for plaintiff filed September 10, 1987. After careful review of the pleadings and the court being fully advised in the premises, it is hereby:

ORDERED and ADJUDGED that said motion is DENIED.

DONE and ORDERED in chambers at the United States District Courthouse, Miami, Florida this 2 day of December 1987.

Kenneth L. Ryskamp
UNITED STATES DISTRICT JUDGE

cc: to all counsel of record

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 87-1309-Civ-Ryskamp

Edith Horowitz Broida

v.

Edmund W. Newbold

This cause is before the Court upon motion by plaintiff for hearing on plaintiff's motion for reconsideration of summary judgment filed September 10, 1987. After careful review of the pleadings and the court being fully advised in the premises, it is hereby:

ORDERED AND ADJUDGED that said motion is denied.

DONE and ORDERED in chambers at the United States District Courthouse, Miami, Florida this 18 day of September 1987.

Kenneth S. Ryskamp
United States District Judge

cc: to all counsel of record

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 87-1309-Civ-Ryskamp

Edith Horowitz Broida,

v.

Edmund Newbold

ORDER GRANTING DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT

This cause is before the court upon defendant's motion for summary judgment filed August 10, 1987. Defendant, Newbold is subject to a qualified immunity as he has shown he acted within the scope of his discretionary authority. Plaintiff has not met her burden that Newbold violated clearly established law. See, Ziegler v. Jackson, 716 F2d 847, 849 (11 Cir. 1983); Marrero v. v. City of Hialeah, et al., 581

F. Supp 1207 (S.D. Fla. 1984, aff'd 774 F2d 1177 1985.

It is therefore
ORDERED AND ADJUDGED that said Motion is Granted.

DONE and ORDERED in chambers at the United States District Courthouse, Miami, Florida this 2 day of September 1987.

Kenneth L. Ryskamp
UNITED STATES DISTRICT JUDGE
cc: to all counsel of record

In The Circuit Court of The 11th Judicial Circuit In and For Dade County, Florida

Case No. 78-1553
77-5299

In Re: The Estate Of
Maurice Horowitz,

Deceased.

In Re: Estate of
Ann Horowitz,

Deceased.

Excerpt transcript of proceedings had in the above-styled cause, came before the Honorable Edmund W. Newbold, Circuit Court Judge, at the Dade County Courthouse, 73 W. Flagler Street, Miami, Fla., on the 15th day of May,1984.

Mr. Horowitz: Let me say something. I am very satisfied with my attorney, Mrs. Broida. I do not want to change to another attorney, but I do not believe that I can have a fair hearing before this Court. A statement was made at the last hearing directly by the Court to Mrs. Broida, that I do not like you as a person.
The Court: I do not recall under any circumstances ever having made such a statement.
Mr. Horowitz: I say that now and I will say it under oath.
The Court: I'm ready to rule.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 87-1309-CIV-RYSKAMP

EDITH HOROWITZ BROIDA,
Plaintiff,

vs.

EDMUND W. NEWBOLD,
Defendant.
_____/

AFFIDAVIT OF THE HONORABLE EDMUND W. NEWBOLD

STATE OF FLORIDA)
) SS
COUNTY OF DADE)

Defendant, the Honorable Edmund W. Newbold, Circuit Judge, Eleventh Judicial Circuit, State of Florida, being first duly sworn, deposes and says:

Affiant is and was at all pertinent times a judge of the Circuit Court of the Eleventh Judicial Circuit, State of Florida, assigned to the Probate Division of said court. In his official capacity as Judge of the Probate Court, affiant presided

over the probate of an estate identified in paragraph 1 of the complaint, but affiant ended his capacity as presiding judge of said cause by entry of an order of recusal. Thereafter, affiant entertained a motion to vacate the aforesaid recusal order previously entered by affiant. Affiant denied the motion.

Affiant did not assign the cause to Judge Tendrich, nor did affiant in any way influence that assignment. Affiant has exerted no control or influence of any sort whatsoever over the probate proceeding subsequent to his denial of he motion to vacate the recusal order. All acts committed by affiant were done within the scope of the discretion invested in him as a public official. The denial of the motion to vacate the recusal order is the only act committed by affiant in any way connected, directly or indirectly, with the allegations

of this complaint, except for judicial acts committed by him in his capacity as presiding judge of the probate proceeding with subject matter jurisdiction of the subject probate proceeding.

FURTHER AFFIANT SAYETH NAUGHT.

EDMUND W. NEWBOLD

SUBSCRIBED AND SWORN TO
BEFORE ME THIS 10th
DAY OF AUGUST, 1987.

Ruth R. Bueter
NOTARY PUBLIC, State of Florida at Large

MY COMMISSION EXPIRES: July 4, 1980

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 87-1309-CIV-RYSKAMP

EDITH HOROWITZ BROIDA,
Plaintiff,

vs.

EDMUND W. NEWBOLD,
Defendant,
_____/

DEFENDANT NEWBOLD'S MOTION FOR SUMMARY JUDGMENT

Defendant NEWBOLD moves for summary judgment because the uncontroverted facts alleged in the complaint and averred in the affidavit of defendant NEWBOLD show that there is no genuine issue of material fact as to the liability of this defendant, and that this defendant is entitled to judgment in his favor as a matter of law. This motion is accompanied by the affidavit of defendant NEWBOLD, and a statement of facts and supporting memorandum of law, as required by local rule. This motion is based upon the following grounds or reasons:

1. The alleged conduct of defendant NEWBOLD was undertaken pursuant to the exercise of his discretionary authority, and he is therefore protected from liability by a qualified immunity based upon good faith. He is also protected from liability by absolute immunity for judicial acts.

2. The conduct of Defendant NEWBOLD did not amount to a constitutional tort.

3. An adequate post deprivation remedy is provided by state law.

I DO HEREBY CERTIFY that a true and correct copy of the foregoing was mailed to the offices of Edith Broida, ESQ., 420 Lincoln Road, Suite 324, Post Office Box 390751, Miami Beach, Fla., 33119, this 10 day of August, 1987.

ROBERT A. GINSBURG
Dade County Attorney
Metro-Dade Center
Suite 2810
111 N. W. 1st Street
Miami, Florida 33128
(305) 375-5151

By: _____
Roy Wood